

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Sections 15.35 and 15.253 of the	)	ET Docket No. 11-90
Commission's Rules Regarding Operation of	)	RM-11555
Radar Systems in the 76-77 GHz Band.	)	
	)	
Amendment of Section 15.253 of the	)	
Commission's Rules to Permit Fixed	)	ET Docket No. 10-28
Use of Radar in the 76-77 GHz Band.	)	
	)	

**COMMENTS OF AUTOLIV ACTIVE SAFETY SYSTEMS**

Autoliv Active Safety Systems division of Autoliv Inc. submits these comments in response to the Notice of Proposed Rulemaking (Notice)<sup>1</sup> in the above-captioned proceeding.

**Autoliv's Interest**

Headquartered in Stockholm, Autoliv Inc. develops and manufactures automotive safety systems for all major automotive manufacturers in the world. Autoliv is the world's largest supplier of air bags and seat belts. Together with its joint ventures, Autoliv has more than 80 facilities with 43,000 employees in 29 vehicle-producing countries. In addition, the company has technical centers in nine countries around the world, including 20 test tracks, more than any other automotive safety supplier. Sales in 2010 amounted to US\$ 7,171 millions.

In the United States, Autoliv has facilities in Brigham City, Promontory, Tremonton and Ogden UT; Goleta CA; Lowell MA; and Southfield MI. In 2008, Autoliv acquired the automotive radar business from Tyco Electronics, and in 2010 acquired Visteon's radar system business. Autoliv's

---

<sup>1</sup> Notice of Proposed Rulemaking in ET Dockets No. 10-28 and 11-90, released May 25, 2011 (26 FCC Rcd 8107 (2011)).

products include industry-leading Blind Spot and Rear Cross Traffic Detection Systems as well as high performance Radar, Night Vision, and Mono/Stereo Vision Systems.

Autoliv recently acquired an exclusive license for monovision based algorithms for Traffic Sign Recognition (TSR), Lane Detection and Light Source Recognition. By monitoring traffic signs, TSR helps the driver to keep the correct speed and follow other traffic rules; “Lane Detection” is used to warn against unintended (inadvertent) lane changes, and “Light Source Recognition” to automatically identify tail and head lights when vehicles meet or pass each other to avoid distracting other drivers.

### **Summary of Proposals**

The Commission proposed to eliminate the existing requirement that vehicular radars decrease power when the vehicle on which the radar is mounted is stopped, or not in motion. The Commission also proposed to expand the authorization for unlicensed 76-77 GHz band radars to allow their use in fixed infrastructure systems.<sup>2</sup>

### **Autoliv’s Position on the Proposals**

Autoliv supports the proposal in ET Docket No. 11-90 regarding the operation of automotive radar systems in the 76-77 GHz band. Removing this condition would be consistent with regulations in other regions.

---

<sup>2</sup> See the first sentence of proposed Section 15.253(b), which is proposed to read “Operation within the band 76.0–77.0 GHz is restricted to vehicle-mounted field disturbance sensors used as vehicle radar systems and to fixed radar systems.”

However, Autoliv is concerned that the evidence is currently insufficient to proceed in ET Docket No. 10-28, regarding operation of fixed radar systems in the same band.

Autoliv has significant concerns regarding a general deployment of fixed radar installations near public roads as these devices may illuminate in an uncontrolled and uncoordinated way creating a high risk of harmful interference into automobile radars.

Respectfully Submitted,

Jeff Coote  
Director Active Safety Systems  
Autoliv  
PO Box 1858  
Lowell MA 01853

Jeffrey Krauss  
Consultant to Autoliv  
620 Hungerford Dr. #27  
Rockville MD 20850

July 18, 2011